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5 Attorney for Defendant Todd Quincey Freeman

6 UNITED STATES DISTRICT COURT  
7 SOUTHERN DISTRICT OF CALIFORNIA

8  
9 UNITED STATES OF AMERICA,

10 Plaintiff,

11 vs.

12 TODD QUINCEY FREEMAN,

13 Defendant

14 } Criminal Case Number: 08-MJ-0238

15 } **JOINT MOTION TO MODIFY  
16 CONDITIONS OF RELEASE TO ALLOW  
17 TRAVEL FROM FEBRUARY 17 – 19,  
18 2008**

19 Defendant, by and through his counsel of record and the consent of the  
20 government, by and through Assistant U.S. Attorney Carla J. Bressler, moves this Court  
21 for an Order approving the following modification of Mr. Freeman's conditions of  
22 release:  
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24 Mr. Freeman asks this Court to modify the conditions of his  
25 release to allow him to travel to Long Beach, California from  
26 February 17, 2008 to February 19, 2008 to visit his daughter.  
27 All other conditions of his release will remain the same.

28 This Motion is based on this pleading, and any and all other oral or written  
information supplied to the Court upon the hearing of this Motion. Assistant U.S.  
Attorney Carla J. Bressler and U.S. Pre-Trial Services Officer Dave Horton have been  
contacted about this motion and neither has any objection.

1 Dated: February 14, 2008

2 Respectfully submitted,

3 /S/  
4 Knut S. Johnson  
5 Attorney for Defendant Todd Quincey Freeman  
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